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March 29, 2018

Karen Witherspoon, Senior Planner
Lewis County Department of Community Development
2025 NE Kresky Ave
Chehalis, WA 98532



RE: Skookumchuck Wind Energy Project - SEPA Checklist (SEP18-0002) Request for Additional Information

Dear Ms. Witherspoon:

Thank you for your review of the SEPA Checklist (SEP18-0002) for the Skookumchuck Wind Energy Project (Project). Your request for additional information was received and reviewed. Skookumchuck Wind Energy Project, LLC (Applicant) has included responses to the information requested and comments provided in your March 22, 2018 letter.

**Comment 1:**

*Background Information*

*Item 8 lists the following studies already completed for the project (located on pages 2 and 3 of the SEPA checklist). Please submit them for our review:*

- *Marbled Murrelet Radar Study (2015)*
- *Skookumchuck Site Characterization Habitat Study (2011)*
- *Baseline Avian Activity Surveys (2015)*
- *An Acoustic Study of Bat Activity at the Proposed Skookumchuck Wind Energy Project, Washington (2016)*
- *Geotechnical Engineering Report (2017)*
- *Phase I Cultural Resources Inventory Report (2016)*
- *Noise Impact Assessment Technical memorandum (2017).*

**Response:**

The Applicant has included a copy of all reports listed above as Attachments A through G to this response letter.

**Comment 2:**

*In addition, the checklist states that the project is preparing studies on wetlands, traffic impact analysis, and visual resources simulations and analysis. Please update us on the current status of these studies and when you expect their completion.*

**Response:**

Wetlands:

- A portion of the Project Area had been surveyed in 2017, and the report for this initial survey will be provided by mid-April.
- Remaining areas that were not already surveyed in 2017 will be surveyed for wetlands and waters in April or May 2018.

Traffic Impact Analysis:

- The traffic analysis will be completed by the middle of April or beginning of May.

Visual Resources Simulations and Analysis

- Visual simulations will be prepared concurrent with the DEIS and will be included and analyzed in the DEIS visual resources chapter.

**Comment 3:**

*B. Environmental Elements*

*Item 1 Earth subsection (d) on the SEPA checklist, states that there is a history of landslides "along portions of access road locations and adjacent to WTG locations S21 through S26, Substations SS1 and Laydown/Batch Plant Option 3" (page 12 of the SEPA checklist). Please amend your Project Overview sheets to show the location of these geologically hazardous areas.*

**Response:**

A new figure showing the location of DNR-mapped landslide hazard areas within the Project Area is attached (Attachment H) to this response letter.

**Comment 4:**

*In addition, Item 1 Earth subsection (h) states that "A hazards assessment and geotechnical boring will be completed for proposed locations prior to foundation design" (page 12 of the SEPA checklist). Please add to the Project Overview sheets potential alternative locations for project infrastructure if studies demonstrate a need to accommodate geologic hazards within the project area, and clarify in this subsection the concept of micrositing corridors.*

**Response:**

The geotechnical report provided as Attachment E2 addresses the potential for geological hazards at locations near mapped landslide areas. Geotechnical borings have been performed at each of the proposed WTG locations, and results are summarized in the report. Results of geotechnical borings indicate that subsurface materials at the proposed turbine locations are suitable for the proposed development, provided that appropriate site preparation methods for support of WTG foundation systems are employed. In accordance with recommendations provided in the report, site preparation methods will vary according to subsurface conditions. Sites with loose, soft, steep or overly-wet soils may require extra precautionary measures such as proof rolling and subgrade verification; moisture conditioning and subgrade compaction; benching of steep slopes (greater than 5:1); and/or over-excavations and replacement with structural fill.

The report identifies two turbine locations where foundations will need to be specifically designed to address poor soils. Although the report presents two ways to mitigate poor soil conditions (moving turbines or additional design considerations for their foundations at these locations), the Applicant has chosen to maintain the turbines in the selected locations and implement the design considerations proposed for the foundations to mitigate the soil conditions.

Additional geotechnical consultations are planned to occur throughout the design phase of the project to verify that foundation recommendations have been properly interpreted and incorporated into final design.

In the event that unforeseen circumstances require a change in WTG placement, an alternate location would be developed within the micrositing corridor. This is the purpose of the micrositing corridor; to define the maximum area where project facilities might occur, while allowing for minor refinements in the location of proposed project facilities to accommodate site-specific constraints as design progresses.

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**Comment 5:**

*Item 14 Transportation does not provide specific information regarding the route and method for delivering project infrastructure to the site. Attachment A to the checklist describes potential Regional Haul Routes (pages 11 and 12). The checklist states "Because certain components are very long, temporary modifications to roadside areas, and potentially shoulders may be required to allow passage of such loads."*

*Please provide more descriptive detail regarding the potential impacts to road shoulders and how the project intends to mitigate them. Furthermore, because SEPA requires examination of the project in its entirety during threshold review, more definitive information on the route is necessary. This allows the county to identify other governmental agencies who have jurisdictional interest in the project to comment during environmental review.*

**Response:**

The Applicant has conducted preliminary analyses of the existing transportation routes which will most likely be used to transport components from the Port of Tacoma to the O&M Facility. The analyses provide specific consideration for transporting materials such as the wind blades, tower sections, and hubs and nacelles that require trucks with longer wheel bases and limited maneuvering capabilities. A final route analysis will be completed once WTG components have been acquired by the Applicant and routes reviewed and approved by WSDOT and appropriate cities and counties. It is possible that deviations from the routes currently analyzed could be selected to further minimize impacts. Nevertheless, the impacts identified in the preliminary analyses represent the range of impacts that may result to transportation corridors.

Attachment I provides a figure identifying the anticipated route of the components. Large components are expected to be transported by marine vessel to the Port of Tacoma, where they will be transferred to specialized haul trucks used for such oversize and overweight components. Once loaded, haul trucks will exit the Port of Tacoma via one of two routes after merging onto Port of Tacoma Road: right onto I-5 southbound or right onto SR 509, then left on SR 705, merging southbound onto I-5. From I-5, the trucks will take Exit 127 and then turn left onto SR 512. Trucks will then travel south and southwestward via SR 7 and SR 507, and then towards the Vail area via county roads. Deliveries will terminate at the main construction laydown area located at the O&M Facility yard.

Most haul route impacts occur as a result of minor obstructions (road signs, trees, light, and low clearance utility poles) adjacent to, or within the shoulders to, the travel route, which will prevent turning of the long load. Occasionally, intersections are configured in such a manner that the truck will need to cross into the wrong lane to travel through an intersection. Closer to the Project site, two intersections will require widening: the left turn from SR 507 onto Vail Road SE, and the left turn from Vail Cut Off Road to Vail Loop Road. Haul route impacts at specific locations are still being reviewed and mitigation selected; these will be identified in the Applicant's DEIS.

Please let me know if you have any questions or if we can provide additional clarification. Thank you in advance for your review of these materials.

Sincerely,

TCCarroll

Theresa Carroll
Permitting Director